

Exhibit T

From: [Fontaine, Senior Master](#)
To: [Daniel Cundy](#)
Cc: [David Boies2](#); [Sigrid McCawley](#); [Andrew Villacastin](#); [Sabina Mariella](#); [Alex Boies](#); [Gary Bloxsome](#); [foreignprocess.rcj@justice.gov.uk](#); [Moore, Pat](#); [Foley, Jennifer](#)
Subject: RE: Virginia Giuffre v. Prince Andrew No.21-cv-06702-LAK
Date: Wednesday, September 15, 2021 2:31:48 PM
Importance: High

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Dear Mr Bloxsome and Mr Cundy,

Thank you for your letter of today, in which you set out your reasons why you consider that the Hague Request is not valid.

I do not consider that it is appropriate for me to determine this disputed issue by email. As I stated in my email of yesterday, you may challenge my decision by application, on notice to the Defendant. I would then convene a hearing (which may be conducted remotely or in person in the Royal Courts of Justice). If you confirm that you do intend to challenge the decision by application notice I will set a deadline for the application to be issued, and order that the Hague Service request will not be processed until the application is determined. I will then set a short timetable for evidence by witness statement to be served and list a hearing convenient to both parties as soon as possible in October. The Plaintiff will have to instruct lawyers authorised to practice in this jurisdiction to allow her to be represented. Both parties should provide their available dates and a time estimate to my Listing Clerk Mr Eves, whose details appear below.

If an application is made to the US court for a Hague Request to be issued, as indicated might be the case, and that is approved by Judge Kaplan, then the question of the validity of the present Hague Request will presumably no longer be relevant, so I will take account of that deadline in the US court in the timetabling.

Regards
Barbara Fontaine
Senior Master of the Queen's Bench Division

PA: Elaine Harbert Tel. 0207 947 6911 elaine.harbert1@justice.gov.uk
Listing Clerk: Jonathan Eves Tel. 0203 936 8957 jonathan.eves@justice.gov.uk

From: Daniel Cundy <daniel.cundy@blackfords.com>
Sent: 15 September 2021 17:21
To: Fontaine, Senior Master <SeniorMaster.Fontaine@ejudiciary.net>
Cc: xboies@gmail.com; smccawley@bsflp.com; AVillacastin@bsflp.com; SMariella@bsflp.com; ABoies@bsflp.com; Gary Bloxsome <gary.bloxsome@blackfords.com>; foreignprocess.rcj@justice.gov.uk; Moore, Pat <pat.moore@Justice.gov.uk>; Foley, Jennifer <jennifer.foley@Justice.gov.uk>
Subject: Virginia Giuffre v. Prince Andrew No.21-cv-06702-LAK

Dear Senior Master Fontaine,

Further to your email today (10:24) to Mr Boies, copying in our firm.

Please find attached, respectfully for your attention, our letter and attachments in reply.

Yours sincerely

Daniel Cundy | Partner

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COVID-19 – Please see our website [here](#) for our updated position in relation to Coronavirus.

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